

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

**VIA ECF**

January 28, 2019

The Honorable Sarah Netburn  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The PECs file this letter motion to supplement their pending request for oral argument of Plaintiffs' motion to compel (ECF 4341) to provide for oral argument - at the same time as the motion to compel - of Saudi Arabia's related letter motion-application to seal and redact judicial documents filed regarding that motion to compel (ECF 4304). Briefing of Saudi Arabia's letter motion was completed this past Friday. (ECF 4373, 4385).

Plaintiffs believe that it would assist the Court and the parties to hold oral argument of the Plaintiffs' motion to compel and Saudi Arabia's letter motion to seal and redact judicial documents at one time, as the same documents will be addressed on both motions.

Prior to sending this letter, the PECs contacted Michael Kellogg, Esq., counsel for Saudi Arabia and were informed that Saudi Arabia has no objection to Plaintiffs' request, provided that there is no discussion in open court of the contents of materials that are under seal.

The Honorable Sarah Netburn  
January 28, 2019  
Page 2

Respectfully submitted,

COZEN O'CONNOR

/s/ Sean P. Carter, Esquire

Sean P. Carter, Esquire  
1650 Market Street, Suite 2800  
Philadelphia, PA 19103

MDL 1570 Plaintiffs' Exec. Committee  
for Commercial Claims

MOTLEY RICE

/s/ Robert T. Haefele, Esquire

Robert T. Haefele, Esquire  
28 Bridgeside Boulevard  
Mt. Pleasant, SC 29464

MDL 1570 Plaintiffs' Exec. Committee  
for Personal Injury and Death Claims

KREINDLER & KREINDLER

/s/ Steven R. Pounian, Esquire

Steven R. Pounian, Esquire  
Andrew J. Maloney, Esquire  
750 Third Avenue, 32<sup>nd</sup> Floor  
New York, NY 10017

MDL 1570 Plaintiffs' Exec. Committee  
for Personal Injury and Death Claims

cc: All Counsel via ECF